

United States District Court  
Southern District of Texas  
Corpus Christi Division

United States Courts  
Southern District of Texas  
FILED

Bobbie Lee Haverkamp  
Plaintiff

DEC 31 2020

David J. Bradley, Clerk of Court

vs

Civil Action

2:17-CV-18

Dorinda Luthcum, Jumper  
Hudson, Keiser, Benson  
Johnson, Benson, Wyrick  
Benson, Budgewater  
Defendants.

Plaintiffs' Advisory to the Court,  
Objections to (9) Nine Defendants  
that failed to answer Dec 14, 2020  
Court orders.

To the Honorable Judge of Said Court,

Now Comes, Ms Bobbie

AKA the Plaintiff and informs the Court  
the Nine (9) Defendants have not answer  
the Court orders to answer by Dec 14, 2020

The following Defendants have provided no answers: Temper, Hudson, Keiser, Benson Johnson, Bensus, Wyrick, Beeson, Bidgewaters.

Dr. Luthicam answer is a "General Denial" which basically in terms of legal jargon says the Defendants denies the allegations, — Now, you prove it.

This throws the Civil Action in the Courts lap under "Sua Sponte" summary Judgement using Celotex Corp - v - Catrett standard<sup>①</sup>

or

We go to trial

Either way the Court has to examine the evidence for Summary Judgement or trial.

Your Honor, the Plaintiff needs the other nine (9) Defendants answer to the Civil Action before the Plaintiff submits the "Genuine Issues". Dr. Luthicam's answers has Quirks in it that needs to be addressed

① 477 U.S. 317, 326, 106 S.Ct 2548, 2554 (1986)

Dr. Linthicum's Quirks  
in her answers.

Your Honor, I'll take this by the members in the interest of moving on and it's just to point out Dr. Linthicum's quirks.

① On page 1, Statement of Case, the Court will notice Dr. Linthicum is saying the Plaintiff alleges in her position as a member of CMHAC violated Constitutional rights under the 8th Amendment

Plaintiff's response — Not so!! Dr. Linthicum is a certified by the Courts, certified Defendant that represents Mental / Medical Health Directors to provide medical treatments and Hormone therapy under the 2012, CID Policy 51.11

Dr. Linthicum uses the same tired arguments throughout her answer, that basically she's whining about she's entitled to sovereign immunity

2. The Court will notice Dr. Luthicam was using a legal defense tactic, she looks "personal knowledge" — its all through her answers.

Your Honor, in trial, a Court Appointed Attorney for the Plaintiff will dice Dr. Luthicam into mince meat under the Williams Standard that says when inexperienced Medical Personnel under take to treat medical problems of the Plaintiff they are held to the same professional standard of an experienced medical professional.

Lets remember, Dr. Luthicam under retired Magistrate Judge Ellington dodge the question of who could provide relief to the Plaintiff.

Magistrate Judge Ellington was forced to approved a Civil Action under John/Jane Doe.

About 45 days later, the Texas Attorney General submitted 10 names to the Court, then when the Defendants lost the 12B motion for failure to state a claim, jump ship and brought in new people to represent.

There's no success in hushy out  
the history of the Civil Actions.

The Court is asks to take notice  
that no matter how Dr. Luthicem whines  
about lack of personal knowledge, she  
had ample opportunity to name the Medical  
and Mental Health Directors that could  
provide treatment plans and hormone therapy.

Instead the Defendants gutted the  
2012 policy of G-51.11 that named these  
people.

This is all on file and will  
be brought in a Sua sponte Summary  
Judgement as trial.

Court Docket 67/68 is still in need  
of a ruling from the Court.

- 3) The Plaintiff is well aware  
the Defendants General Denial is pushing  
the Plaintiff in a position of "Put up"  
or "Shut up"

This position is deadly for the  
Defendants. The Plaintiff can meet.

④ Your Honor, in Dr Luthicams answer page 6, top of the page, item (5) whether Haverkamp is medically qualified to receive sexual reassignment surgery.

This is a interesting point, yet Dr. Luthicam doesn't finish what the Court has defined as the [true reach] of the present Civil Action.

The following interesting parties Selene of the Styles Unit, Sky Blue of the Styles Unit, Bella of the Styles Unit, Lilly Hopkins of the Telford Unit, Ms Gibson of the Hughes Unit, Ms Merworth of the Hughes Unit all come under the [reach] of Civil Action 2:17-CV-18.

The Court ruled the above people were protected ② under the present Civil Action along with other transgenders being M/F or F/M.

So the Plaintiff ① if there is a Sex spent Summary Judgement will require a medical examination by the Plaintiff expert witnesses for SRS as for trial.

Now, under Equal Protection the present Civil Action covers transgenders, ① and other interesting parties that are ready for SRS

② Unless shown otherwise, the Civil Action protects and represents their interests.

either male to female or female to male, that's the true reach of the civil actions.

Using Dr. Liothicum lodge there logically speaking how many are medically qualified to receive sexual reassignment surgery.

The Plaintiff ~~motion~~ asking Dr. Gordon of the Defendants Gender Clinic an Evaluation to provide a number, is sound reasoning.

So, How many Male to Female are they?

So, How many Female to Male are they?

Your Honor, Dr. Liothicum open the Door, Discovery will get us there.

5) The Defendants very lightly address the Plaintiff's Equal Protection claim, yet is rising to the point that SRS becomes a secondary issue.

The issue is, Does a transgender have the right to Equal Protection of law in Texas Prisons that provided medical care



that a Hetrosexual male receives as  
cisgender female inmate

Does the State have the Right to  
deny medical care saying basily that a  
Transgender is a Hetrosexual male  
with a mental disorder and does not  
qualify under the WPATH Medical Standards.

So, does a transgender actual have  
a right to exist or is Equal Protection  
denied because the classification in  
Texas doesn't exist?

### Closing

Your Honor, the Plaintiff asks  
for the other nine(9) Defendants answers  
— once I receive them the Plaintiff  
will give the Court her Brief and filed  
the Genuine Disputed Issues.

So Prays the Plaintiff  
Ms Bobbie

12-24-2020

### Certification of Service

No certification was mailed due to this is  
a advisory asking for additional Briefs.

Ms Bobbie